

# CLARK SMITH VILLAZOR

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May 19, 2023

**VIA ECF**

Honorable Michael A. Hammer  
United States District Court for the  
District of New Jersey  
Martin Luther King Courthouse  
50 Walnut Street Room 2C  
Newark, NJ 07101

**Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)**  
**Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to modify his bail conditions to allow him to attend the birthday party of his son at a local venue on May 30, 2023. The time and location of the party shall be disclosed to and approved by Pretrial Services. Mr. Goettsche will be accompanied by a third-party custodian at the birthday party.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goettsche to remain under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other proposed consent bail modifications to these conditions (dkt. 187, 193, 225, 229, 251, 257, 270 and 281). The Court previously denied a motion to modify bail conditions (dkt. 268).

Pretrial Services has no objection to this proposed request. The government, through AUSA Jamie Hoxie, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.  
CLARK SMITH VILLAZOR LLP

Addressee

May 19, 2023

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